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May 24, 2018

By Electronic Filing

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

*Re: Notice of Ex Parte Communication  
GN Docket No. 12-268 (Expanding the Economic and Innovation Opportunities of  
Spectrum Through Incentive Auctions)  
MB Docket No. 16-306 (Post Incentive Auction Broadcast Transition Plan)*

Dear Ms. Dortch,

This letter is submitted, pursuant to Section 1.1206(b)(1) of the FCC's rules, to notify you of a meeting held May 22, 2018, among representatives of American Tower Corporation ("ATC") and the FCC staff. The meeting was intended to update the staff regarding the steps ATC has undertaken to prepare for the repack of TV licensees following the Incentive Auction. Representing ATC were Peter Starke, Vice President – Broadcast and Paul Roberts, Vice President - Compliance; and ATC's counsel David A. O'Connor of Wilkinson Barker Knauer, LLP. Attending the meeting from the FCC staff were Jean Kiddoo, Hillary DeNigro, Pam Gallant, Barbara Kreisman, Charlie Meisch, Evan Morris, Raphael Sznajder, Tony Coudert, Cindy Cavell (Cavell & Mertz), and Mike Rhodes (Cavell & Mertz). ATC discussed the issues identified in the attached presentation. Please contact the undersigned if you have any questions.

Sincerely,

/s/ Christine M. Crowe  
Christine M. Crowe

Attachment

Cc (w/att): Participants



**AMERICAN TOWER®**

# FCC – Broadcast Incentive Auction

American Tower TV Repack Program

UPDATE

May 22, 2018

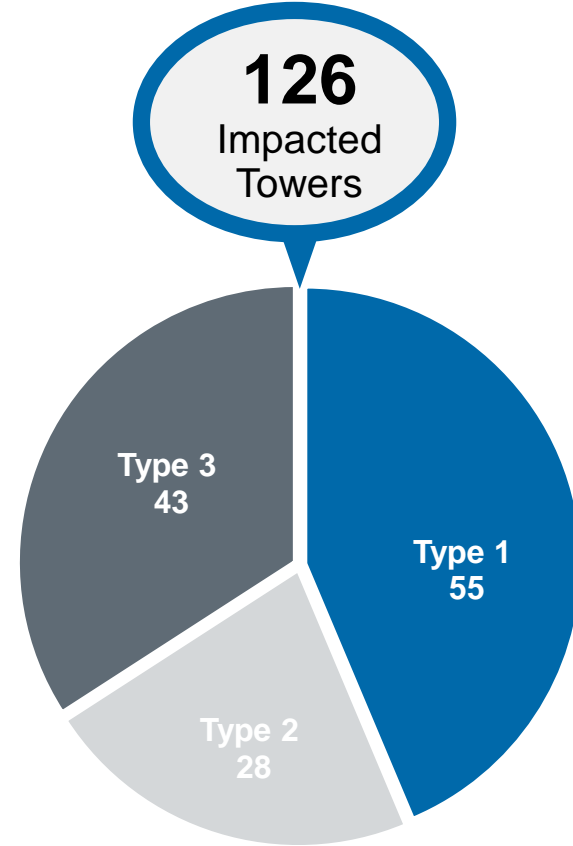
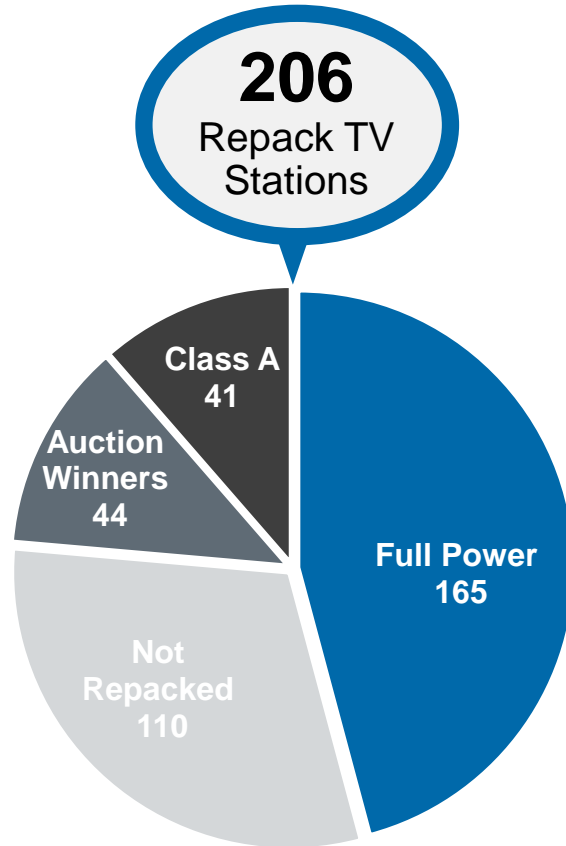


# Executive Summary

- › Slow start to repack due to repack stations waiting for reimbursement confidence and maximization window approvals
- › American Tower repack program in high gear
- › All projects vetted for cost and scheduling efficiencies
- › Continual undertaking to lock down external repack resources
- › Originally forecasted resources shortfall starting to materialize
- › Safety remains our #1 priority



# Tower & Station Statistics



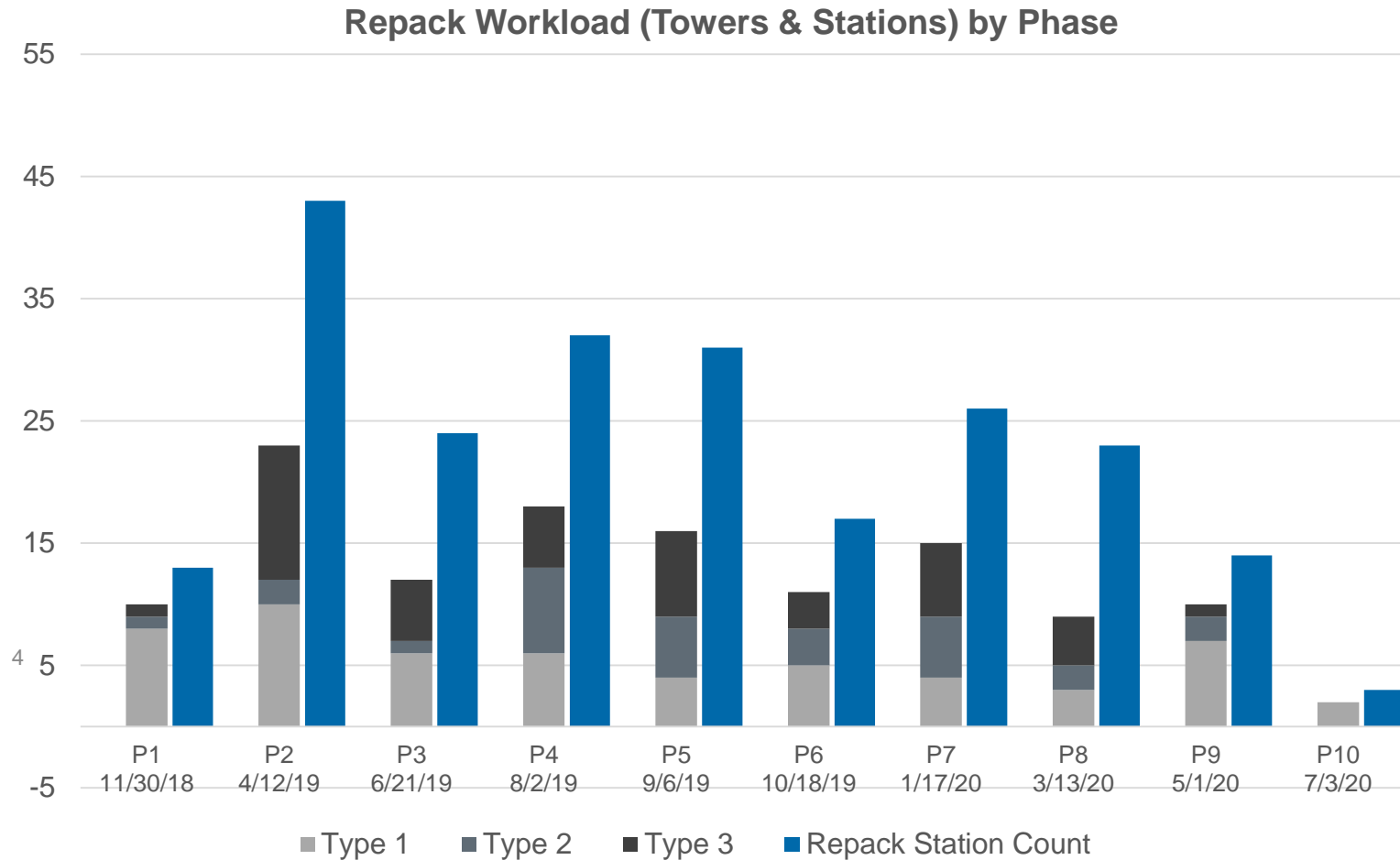
**PROJECT TYPE:**

- Type 1 - No tower or site modifications
- Type 2 - Moderate tower and or site modifications
- Type 3 - Complex towers, New BBAs, major tower mods

**21% of all repack stations on ATC Assets**



# Tower & Station Statistics



Project scheduling challenges likely to begin in Phase 2



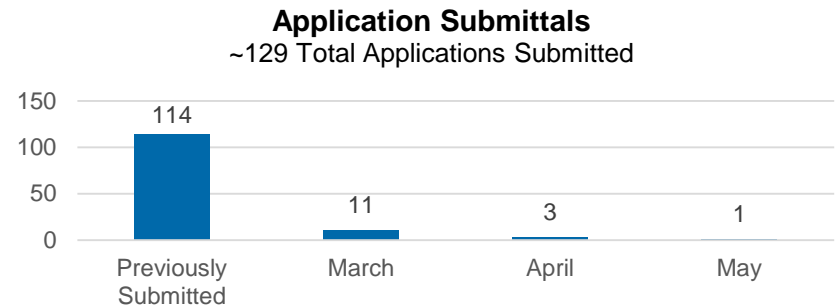
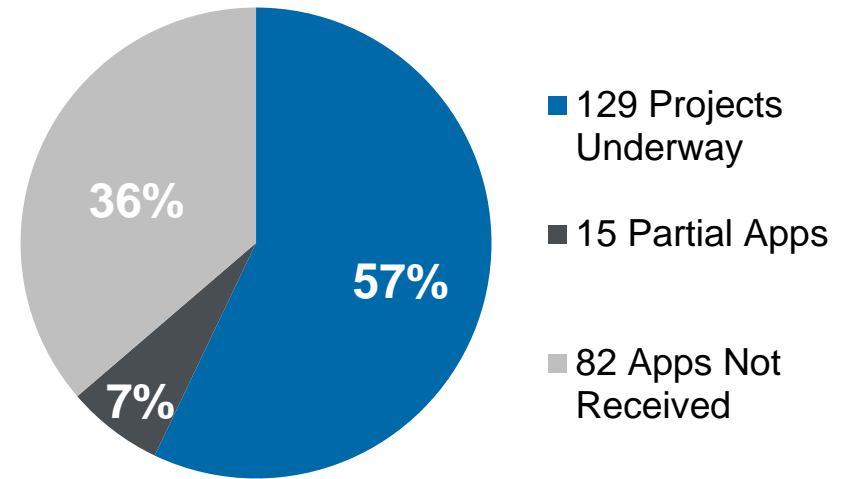
# Project Status

## Application Detail by Phase

- > **Phase 1:** All 13 applications received
- > **Phase 2:** 39 applications received, 5 remaining
- > **Phase 3:** 18 applications received, 6 remaining
- > **Phase 4:** 16 applications received, 15 remaining
- > **Phases 5-10:** 43 applications received, 72 remaining

## Project Highlights

- > First BBA project completed October 2017
- > 6 Phase 1 stations completed construction
- > First tower modification completed in April 2018
- > Currently securing local jurisdiction permits for 27 Phase 1, 2 and 3 stations



**Drop off in applications as stations focus on Phases 1- 4 construction**



# Broadband Antenna Statistics

## Existing UHF BBAs

- 29 BBA systems currently operate in 19 markets
- 23 systems impacted
- Impacted systems evaluated for their new repack channel use
- 16 systems will be reconfigured for new channels
  - Designs completed for all
  - Pricing completed for new equipment
  - 1 system under construction
- 3 systems will not support new channel due to antenna bandwidth or transmission line limitations
  - Options for antenna and line to support channels and pricing provided
- 4 systems will be decommissioned

**Existing systems were offered to other repack stations for main or interim main use. Only 3 additional repack stations using existing BBAs**

## New UHF BBAs

- 14 new BBA systems in the following nine markets:
  - Chicago
  - Dallas
  - Houston
  - Atlanta
  - Boston
  - Detroit
  - Orlando
  - Oklahoma City
  - Norfolk
- New systems will support 36 stations as main, interim main and auxiliary transmission
- 1 new system completed October 2017
- 11 systems in construction
- 2 systems in final design

**Most new systems will include vPol. Cost for addition of vPol components is not included in 399 estimates**



# Internal Repack Resources

- › **Repack Program Manager**

- › Dedicated manager to run project

- › **Broadcast Construction Management**

- › 5 dedicated construction managers

- › **Leasing Management**

- › Applications – Special repack process handled by one dedicated specialist
- › Legal contracts – Dedicated legal resources and special repack documentation
- › Notice to Proceed (NTP) – Special process requiring coordination with construction manager and third party tenants on towers impacted by the work

- › **Sourcing and Procurement**

- › Advance procurement of RF transmission equipment
- › Special tracking of materials and costs associated with repack

**Two years of planning and preparation in action**





# External Repack Resources

## › Rigging Crews

- › Slight uptick in the number of qualified complex tower crews
  - › Most complex crews booked or committed to projects through 2019
- › Increase in number of crews for less complex projects
  - › Most now reaching booked or committed work backlogs through first half of 2019

## › Structural Engineers

- › Experiencing longer completion times for tower analyses and modification designs

## › Tower Modification Materials

- › Backlog of materials and shipping starting to stretch our delivery dates

## › General Contractors

- › No issues procuring GCs familiar with broadcast sites for building and ground work

## › RF Transmission Equipment

- › No issues to date, but being told backlog for antennas is rapidly growing

## › Field RF Engineers

- › Scheduling qualified field RF engineers will start to be a challenge

**We continue to work with vendors on scheduling synchronization**



# Summary

- › Slow start has greatly compressed the workload
- › Industrywide dialogue indicates only ~5% of repack stations have completed their on-tower work since July 12, 2017
- › Transition Schedule can be met.....but many stations may be on interim systems beyond their scheduled phase
- › Anticipated post-transition workload and eligible costs will go well beyond 2020 as stations will need to complete their permanent installations and decommission old channel equipment
- › Continued major focus on safety



# Thank You!

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